



MODOC COUNTY OFFICE OF EDUCATION

139 HENDERSON STREET
ALTURAS, CALIFORNIA 96101

530-233-7101

530-233-5531 (FAX)

www.modoccoe.k12.ca.us

*Enhancing the academic,
social, and technical skills of
all Modoc County students.*

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Dear FCC Commissioners:

The FCC's proposed five-year plan requires an additional \$3 billion, beyond the \$2 billion of unspent, one-time money. Ongoing funding has only been identified for the first two years of the five-year plan. Applicants will look at the "five-year" plan, conclude that there is only funding for two years and concentrate their efforts on immediate needs rather than a long-term strategy to address future e-learning instructional needs. Therefore, applications in years one and two will far exhaust all funding.

The FCC is proposing a base funding level of \$6,000 for schools with less than 22 pupils. As a small rural school system, the Modoc County Office of Education appreciates the recognition that some communities are disproportionately and negatively impacted by a per-pupil allocation. However, an arbitrary base does not consider the actual concentrations of poverty and ignores the varying costs and availability of connectivity and broadband in different communities.

The FCC would like to reduce the top-tier discount level from 90 percent to 80 percent. This means that the neediest of schools would see a doubling in their out-of-pocket expenses as it relates to the costs of internal connection services.

Until now, the FCC has been neutral when it comes to allocating resources, neutral by not prioritizing one technology expenditure over another, and neutral in making all funds eligible to all types of institutions. However, the FCC is moving from being neutral in these areas. The top-down proposals will trump local control; those closest to students will have fewer options, for example, the proposed per-pupil cap shifts the focus away from concentrated poverty and the elimination of some technology services forces local decision makers to make less needed technologies a higher priority. Lastly, the pilot project for libraries diverts funding and changes the historic position of being entity neutral to favoring libraries. In all of these instances, the proposed changes have the FCC in a position of making ill-informed, value judgments where they used to be neutral.

The FCC should support local schools' efforts to teach high-poverty students through the use of new technologies not decree what is best for the multiplicity of schools throughout a vast country.

With respect,

Gary L. Jones
Modoc County Superintendent of Schools